

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

ALL PENDING CASES

MDL No. 2817

Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

DECLARATION OF PEGGY J. WEDGWORTH

I, Peggy J. Wedgworth, Esq., pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am a partner at Milberg Phillips Grossman LLP, and I represent Dealership Class Plaintiffs ACA Motors, Inc., d/b/a Continental Acura; Baystate Ford Inc.; Cherry Hill Jaguar; Cliff Harris Ford, LLC, d/b/a Warrensburg Ford; Continental Autos, Inc., d/b/a Continental Toyota; Continental Classic Motors, Inc., d/b/a Continental Autosports; 5800 Countryside, LLC, d/b/a Continental Mitsubishi; HDA Motors, Inc., d/b/a Continental Honda; H & H Continental Motors, Inc., d/b/a Continental Nissan; Gregoris Motors, Inc.; Hoover Automotive, LLC d/b/a Hoover Dodge Chrysler Jeep of Summerville; JCF Autos LLC, d/b/a Stevens Jersey City Ford; Jericho Turnpike Sales LLC, d/b/a Ford & Lincoln of Smithtown; Jim Marsh American Corporation d/b/a Jim Marsh Mitsubishi Suzuki Kia Mahindra; John O'Neil Johnson Toyota, LLC; Kenny Thomas Enterprises, Inc. d/b/a Olathe Toyota; Marshall Chrysler Jeep Dodge, L.L.C., d/b/a Marshall Chrysler Jeep Dodge Ram; Naperville Zoom Cars, Inc., d/b/a Continental Mazda; NV Autos, Inc., d/b/a Continental Audi; Patchogue 112 Motors, LLC, d/b/a Stevens Ford; Pitre Imports, LLC d/b/a Pitre Kia; Pitre, Inc. d/b/a Pitre Buick GMC; Teterboro Automall, Inc. d/b/a Teterboro Chrysler Dodge Jeep Ram; Waconia Dodge, Inc.; Warrensburg Chrysler Dodge Jeep, L.L.C., d/b/a

Warrensburg Chrysler Dodge Jeep Ram Fiat, as Dealership Interim Lead Class Counsel and MDL Co-Lead Counsel, in the above-captioned matter.

2. I have personal knowledge of the matters set forth herein, and could and would testify competently thereto if called upon to do so.

3. I submit this declaration in support of the following motions and filings, which are being filed concurrently with this Declaration:

- a. MDL Plaintiffs' Response to Defendants CDK Global, LLC's and The Reynolds and Reynolds Company's Joint Statement of Common Undisputed Material Facts in Support of their Motions for Summary Judgment; and
 - b. Dealership Class Plaintiffs' Memorandum in Opposition to Defendant CDK Global, LLC's Motion for Summary Judgment.
4. Attached hereto as Exhibit 1 is a true and correct copy of selected excerpts from the transcript of the deposition of Chris Hellyer dated November 9, 2018.
5. Attached hereto as Exhibit 2 **Error! No sequence specified.** is a true and correct copy of selected excerpts from the transcript of the deposition of Ronald Lamb dated January 25, 2019.
6. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Steve Cottrell, dated July 28, 2020.
7. Attached hereto as Exhibit 4 is a true and correct copy of selected excerpts from the transcript of the Authenticom Preliminary Injunction Hearing dated June 26-27, 2017.
8. Attached hereto as Exhibit 5 is a true and correct copy of selected excerpts from the transcript of the deposition of H. Neal East dated April 16, 2019.
9. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0787869 to 870 which has been marked as Plaintiffs' Exhibit (PX) 247.
10. Attached hereto as Exhibit 7 is a true and correct copy of a document produced in this

litigation Bates-stamped CDK-1478961 to 962 which has been marked as Plaintiffs' Exhibit (PX) 879.

11. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0834717.

12. Attached hereto as Exhibit 9 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2684858 to 860.

13. Attached hereto as Exhibit 10 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0958150 to 151.

14. Attached hereto as Exhibit 11 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3118702 to 711.

15. Attached hereto as Exhibit 12 is a true and correct copy of selected excerpts from the transcript of the deposition of Michael D. Whinston dated January 10, 2020.

16. Attached hereto as Exhibit 13 is a true and correct copy of selected excerpts from the transcript of the deposition of Michael Noser dated February 13, 2019.

17. Attached hereto as Exhibit 14 is a true and correct copy of selected excerpts from the transcript of the deposition of Malcolm Thorne dated February 7, 2019.

18. Attached hereto as Exhibit 15 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2878952 to 954 which has been marked as Plaintiffs' Exhibit (PX) 835.

19. Attached hereto as Exhibit 16 is a true and correct copy of CDK's Responses and Objections to Dealership Class Plaintiffs' First Set of Interrogatories Concerning CDK's Counterclaims dated July 3, 2019.

20. Attached hereto as Exhibit 17 is a true and correct copy of a document produced in this

litigation Bates-stamped CDK-0847676 to 683.

21. Attached hereto as Exhibit 18 is a true and correct copy of selected excerpts from the transcript of the Preliminary Injunction Hearing dated June 2-3, 2020, in *CDK Global, LLC v. Brnovich*, No. CV-19-04849-PHX-GMS (D. Ariz.).

22. Attached hereto as Exhibit 19 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0863506 to 507.

23. Attached hereto as Exhibit 20 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1454085 to 086.

24. Attached hereto as Exhibit 21 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1995184.

25. Attached hereto as Exhibit 22 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0263393 to 465 which has been marked as Plaintiffs' Exhibit (PX) 1220.

26. Attached hereto as Exhibit 23 is a true and correct copy of selected excerpts from the transcript of the deposition of Lucas Baerg dated April 4, 2019.

27. Attached hereto as Exhibit 24 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0021117.

28. Attached hereto as Exhibit 25 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2923294 to 316.

29. Attached hereto as Exhibit 26 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2923495 to 497.

30. Attached hereto as Exhibit 27 is a true and correct copy of a document produced in this litigation Bates-stamped SIS_DMS_0011752 to 756 which has been marked as Plaintiffs' Exhibit

(PX) 1015.

31. Attached hereto as Exhibit 28 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00020894 to 913.

32. Attached hereto as Exhibit 29 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00017068 to 087.

33. Attached hereto as Exhibit 30 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00017280 to 299.

34. Attached hereto as Exhibit 31 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00017300 to 319.

35. Attached hereto as Exhibit 32 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00018979 to 9003.

36. Attached hereto as Exhibit 33 is a true and correct copy of a document produced in this litigation Bates-stamped CONTINENTAL0005244 to 246.

37. Attached hereto as Exhibit 34 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0905356 to 358 which has been marked as Plaintiffs' Exhibit (PX) 257.

38. Attached hereto as Exhibit 35 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0022018.

39. Attached hereto as Exhibit 36 is a true and correct copy of selected excerpts from the transcript of the deposition of Robert N. Karp dated January 8, 2019.

40. Attached hereto as Exhibit 37 is a true and correct copy of selected excerpts from the transcript of the deposition of Brian Green dated April 25, 2019.

41. Attached hereto as Exhibit 38 is a true and correct copy of selected excerpts from the

transcript of the deposition of Brad Perry dated April 11, 2019.

42. Attached hereto as Exhibit 39 is a true and correct copy of selected excerpts from the transcript of the deposition of Allan Stejskal (Expert) dated November 7, 2019.

43. Attached hereto as Exhibit 40 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00015101 to 106.

44. Attached hereto as Exhibit 41 is a true and correct copy of selected excerpts from the transcript of the deposition of Catherine M. Lawton dated January 8, 2020.

45. Attached hereto as Exhibit 42 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0839308 to 310.

46. Attached hereto as Exhibit 43 is a true and correct copy of selected excerpts from the transcript of the deposition of Hubert (Trey) Gerlich dated November 28, 2018.

47. Attached hereto as Exhibit 44 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0917213 to 217.

48. Attached hereto as Exhibit 45 is a true and correct copy of selected excerpts from the transcript of the deposition of Alan Andreu dated June 19, 2019.

49. Attached hereto as Exhibit 46 is a true and correct copy of a document produced in this litigation Bates-stamped TL00000179 to 185 which has been marked as Plaintiffs' Exhibit (PX) 815.

50. Attached hereto as Exhibit 47 is a true and correct copy of selected excerpts from the transcript of the deposition of Vince Rubino dated January 28, 2019.

51. Attached hereto as Exhibit 48 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2720210 to 212.

52. Attached hereto as Exhibit 49 is a true and correct copy of a document produced in this

litigation Bates-stamped REYMDL00115804 to 810.

53. Attached hereto as Exhibit 50 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1524403 to 404.006 which has been marked as Plaintiffs' Exhibit (PX) 878.

54. Attached hereto as Exhibit 51 is a true and correct copy of the Expert Report of Allan Stejskal, dated August 26, 2019.

55. Attached hereto as Exhibit 52 is a true and correct copy of selected excerpts from the transcript of the deposition of Lucas Hembd dated March 22, 2019.

56. Attached hereto as Exhibit 53 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00068351 to 354 which has been marked as Plaintiffs' Exhibit (PX) 148.

57. Attached hereto as Exhibit 54 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00110417 to 420.

58. Attached hereto as Exhibit 55 is a true and correct copy of the Declaration of Steve Cottrell, dated May 18, 2017.

59. Attached hereto as Exhibit 56 is a true and correct copy of selected excerpts from the transcript of the deposition of Robert Schaefer (Day 2) dated April 18, 2019.

60. Attached hereto as Exhibit 57 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00476939 to 941.

61. Attached hereto as Exhibit 58 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00035465 to 466.

62. Attached hereto as Exhibit 59 is a true and correct copy of a document produced in this litigation Bates-stamped COX_0023904 to 907 which has been marked as Defendants' Exhibit

(DX) 933.

63. Attached hereto as Exhibit 60 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0759281 to 335 which has been marked as Plaintiffs' Exhibit (PX) 865.

64. Attached hereto as Exhibit 61 is a true and correct copy of selected excerpts from the transcript of the deposition of Phillip Battista dated March 14, 2019.

65. Attached hereto as Exhibit 62 is a true and correct copy of the Declaration of Wayne Fitkin, dated June 22, 2017.

66. Attached hereto as Exhibit 63 is a true and correct copy of selected excerpts from the transcript of the deposition of Jason Burton dated April 26, 2019.

67. Attached hereto as Exhibit 64 is a true and correct copy of selected excerpts from the transcript of the deposition of George Colson dated December 20, 2018 .

68. Attached hereto as Exhibit 65 is a true and correct copy of selected excerpts from the transcript of the deposition of Michael Trasatti dated March 20, 2019.

69. Attached hereto as Exhibit 66 is a true and correct copy of selected excerpts from the transcript of the deposition of Steve Cottrell (Individual) dated April 2, 2019.

70. Attached hereto as Exhibit 67 is a true and correct copy of a document produced in this litigation Bates-stamped AL_MDL_0082039 to 041 which has been marked as Defendants' Exhibit (DX) 848.

71. Attached hereto as Exhibit 68 is a true and correct copy of selected excerpts from the transcript of the deposition of Matthew Rodeghero dated December 11, 2018.

72. Attached hereto as Exhibit 69 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2873095 to 097 which has been marked as Plaintiffs' Exhibit (PX)

945.

73. Attached hereto as Exhibit 70 is a true and correct copy of selected excerpts from the transcript of the deposition of Travis Robinson dated April 23, 2019.

74. Attached hereto as Exhibit 71 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3122227 to 228.

75. Attached hereto as Exhibit 72 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0015851 to 856 which has been marked as Plaintiffs' Exhibit (PX) 262.

76. Attached hereto as Exhibit 73 is a true and correct copy of a document produced in this litigation Bates-stamped SIS_DMS_0012834.

77. Attached hereto as Exhibit 74 is a true and correct copy of a document produced in this litigation Bates-stamped SIS_DMS_0015246.

78. Attached hereto as Exhibit 75 is a true and correct copy of selected excerpts from the transcript of the deposition of Beth Ayotte dated October 18, 2018.

79. Attached hereto as Exhibit 76 is a true and correct copy of selected excerpts from the transcript of the deposition of Bradley Miller dated April 30, 2019.

80. Attached hereto as Exhibit 77 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00039156 to 157 which has been marked as Plaintiffs' Exhibit (PX) 374.

81. Attached hereto as Exhibit 78 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00173402 to 407.

82. Attached hereto as Exhibit 79 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00042808.

83. Attached hereto as Exhibit 80 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00156335 to 340.

84. Attached hereto as Exhibit 81 is a true and correct copy of selected excerpts from the transcript of the deposition of Christopher Kirby dated January 30, 2019.

85. Attached hereto as Exhibit 82 is a true and correct copy of the declaration of Wayne Fitkin dated March 22, 2017.

86. Attached hereto as Exhibit 83 is a true and correct copy of the declaration of Chris Longpre dated April 4, 2017.

87. Attached hereto as Exhibit 84 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3122218 to 221.

88. Attached hereto as Exhibit 85 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3119252.

89. Attached hereto as Exhibit 86 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3122868.

90. Attached hereto as Exhibit 87 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00168635 to 635_0002.

91. Attached hereto as Exhibit 88 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2462266 to 268 which has been marked as Plaintiffs' Exhibit (PX) 1181.

92. Attached hereto as Exhibit 89 is a true and correct copy of a document produced in this litigation Bates-stamped AUTH_00169148 to 153.

93. Attached hereto as Exhibit 90 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0828284 to 285 which has been marked as Plaintiffs' Exhibit (PX)

232.

94. Attached hereto as Exhibit 91 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0912093 to 094.

95. Attached hereto as Exhibit 92 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1145836 to 838.

96. Attached hereto as Exhibit 93 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1401555 to 556.

97. Attached hereto as Exhibit 94 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2462263 to 265 which has been marked as Plaintiffs' Exhibit (PX) 444.

98. Attached hereto as Exhibit 95 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0787969 to 970 which has been marked as Plaintiffs' Exhibit (PX) 889.

99. Attached hereto as Exhibit 96 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0974988 to 989.007 which has been marked as Plaintiffs' Exhibit (PX) 875.

100. Attached hereto as Exhibit 97 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0223036 to 038.

101. Attached hereto as Exhibit 98 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00036124 which has been marked as Plaintiffs' Exhibit (PX) (371).

102. Attached hereto as Exhibit 99 is a true and correct copy of selected excerpts from the transcript of the deposition of Edward M. Stroz dated January 23, 2020.

103. Attached hereto as Exhibit 100 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00064849 to 850.020 which has been marked as Plaintiffs' Exhibit (PX) 1402.

104. Attached hereto as Exhibit 101 is a true and correct copy of selected excerpts from the transcript of the deposition of Robert Brockman (Day 1) dated January 16, 2019.

105. Attached hereto as Exhibit 102 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00574089 to 091.004 which has been marked as Plaintiffs' Exhibit (PX) 382.

106. Attached hereto as Exhibit 103 is a true and correct copy of selected excerpts from the transcript of the deposition of Keith Hill dated December 5, 2018.

107. Attached hereto as Exhibit 104 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00189335 to 336.

108. Attached hereto as Exhibit 105 is a true and correct copy of selected excerpts from the transcript of the deposition of Robert Schaefer (Day 1) dated April 17, 2019.

109. Attached hereto as Exhibit 106 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00510170 to 171.

110. Attached hereto as Exhibit 107 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00062228 to 230.

111. Attached hereto as Exhibit 108 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00156826 which has been marked as Plaintiffs' Exhibit (PX) 149.

112. Attached hereto as Exhibit 109 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00211008 to 009.005 which has been marked as

Plaintiffs' Exhibit (PX) 142.

113. Attached hereto as Exhibit 110 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00182785.

114. Attached hereto as Exhibit 111 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00048078 to 079 which has been marked as Plaintiffs' Exhibit (PX) 672.

115. Attached hereto as Exhibit 112 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00222232 to 248 which has been marked as Plaintiffs' Exhibit (PX) 673.

116. Attached hereto as Exhibit 113 is a true and correct copy of a document produced in this litigation Bates-stamped PAG_0000471.

117. Attached hereto as Exhibit 114 is a true and correct copy of a document produced in this litigation Bates-stamped PAG_0000332 to 340.

118. Attached hereto as Exhibit 115 is a true and correct copy of a document produced in this litigation Bates-stamped PAG_0000350.

119. Attached hereto as Exhibit 116 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0835598.

120. Attached hereto as Exhibit 117 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2685300 to 304.

121. Attached hereto as Exhibit 118 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1428553 to 556 which has been marked as Plaintiffs' Exhibit (PX) 128.

122. Attached hereto as Exhibit 119 is a true and correct copy of a document produced

in this litigation Bates-stamped REYMDL00211802 to 808 which has been marked as Plaintiffs' Exhibit (PX) 126.

123. Attached hereto as Exhibit 120 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL567411 to REYMDL567412 which has been marked as Plaintiffs' Exhibit (PX) 141.

124. Attached hereto as Exhibit 121 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00044066 to 068 which has been marked as Plaintiffs' Exhibit (PX) 1417.

125. Attached hereto as Exhibit 122 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0941339 which has been marked as Plaintiffs' Exhibit (PX) 880.

126. Attached hereto as Exhibit 123 is a true and correct copy of selected excerpts from the transcript of the deposition of Howard Gardner (Day 1) dated March 6, 2019.

127. Attached hereto as Exhibit 124 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0904950 to 951.

128. Attached hereto as Exhibit 125 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0872981 to 984 which has been marked as Plaintiffs' Exhibit (PX) 883.

129. Attached hereto as Exhibit 126 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2698334 to 335 which has been marked as Plaintiffs' Exhibit (PX) 236.

130. Attached hereto as Exhibit 127 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0834484 to 485.

131. Attached hereto as Exhibit 128 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0833797.

132. Attached hereto as Exhibit 129 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00247621.

133. Attached hereto as Exhibit 130 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0834881.

134. Attached hereto as Exhibit 131 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0223018 which has been marked as Plaintiffs' Exhibit (PX) 445.

135. Attached hereto as Exhibit 132 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00039153 to 155.

136. Attached hereto as Exhibit 133 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0873420.

137. Attached hereto as Exhibit 134 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2238112.

138. Attached hereto as Exhibit 135 is a true and correct copy of selected excerpts from the transcript of the deposition of Ron Workman dated December 7, 2018.

139. Attached hereto as Exhibit 136 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2053736 to 738 which has been marked as Plaintiffs' Exhibit (PX) 447.

140. Attached hereto as Exhibit 137 is a true and correct copy of selected excerpts from the transcript of the deposition of Steve Anenen dated April 10, 2019.

141. Attached hereto as Exhibit 138 is a true and correct copy of a document produced

in this litigation Bates-stamped CDK-1298414 to 415.006 which has been marked as Plaintiffs' Exhibit (PX) 593.

142. Attached hereto as Exhibit 139 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0917344 to 345 which has been marked as Plaintiffs' Exhibit (PX) 964.

143. Attached hereto as Exhibit 140 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0833234 to 236.

144. Attached hereto as Exhibit 141 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2673485 to 492 which has been marked as Plaintiffs' Exhibit (PX) 885.

145. Attached hereto as Exhibit 142 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2053627 which has been marked as Plaintiffs' Exhibit (PX) 446.

146. Attached hereto as Exhibit 143 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2286511 to 512.009 which has been marked as Plaintiffs' Exhibit (PX) 255.

147. Attached hereto as Exhibit 144 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00274303.

148. Attached hereto as Exhibit 145 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00341586.

149. Attached hereto as Exhibit 146 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00391168.

150. Attached hereto as Exhibit 147 is a true and correct copy of a document produced

in this litigation Bates-stamped CDK-2857638.

151. Attached hereto as Exhibit 148 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1424529 to 532 which has been marked as Plaintiffs' Exhibit (PX) 139.

152. Attached hereto as Exhibit 149 is a true and correct copy of a document produced in this litigation Bates-stamped DOMINION-00148222 to 234.

153. Attached hereto as Exhibit 150 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0847065.

154. Attached hereto as Exhibit 151 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3112159.

155. Attached hereto as Exhibit 152 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3121031 to 034.

156. Attached hereto as Exhibit 153 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3122224 to 226.

157. Attached hereto as Exhibit 154 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0008049 to 062.

158. Attached hereto as Exhibit 155 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2879756 which has been marked as Plaintiffs' Exhibit (PX) 896.

159. Attached hereto as Exhibit 156 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0109347 to 348.006 which has been marked as Plaintiffs' Exhibit (PX) 958.

160. Attached hereto as Exhibit 157 is a true and correct copy of a document produced

in this litigation Bates-stamped CDK-1222549.

161. Attached hereto as Exhibit 158 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0395057 to 059 which has been marked as Plaintiffs' Exhibit (PX) 268.

162. Attached hereto as Exhibit 159 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0314287 to 290.

163. Attached hereto as Exhibit 160 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0854271 to 297.

164. Attached hereto as Exhibit 161 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0053346 to 347.

165. Attached hereto as Exhibit 162 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0026114.

166. Attached hereto as Exhibit 163 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0021983 to 986.

167. Attached hereto as Exhibit 164 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0033294 to 296 which has been marked as Plaintiffs' Exhibit (PX) 1475.

168. Attached hereto as Exhibit 165 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0051555 to 559 which has been marked as Plaintiffs' Exhibit (PX) 1483.

169. Attached hereto as Exhibit 166 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0022989 to 990 which has been marked as Plaintiffs' Exhibit (PX) 1464.

170. Attached hereto as Exhibit 167 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0748736 which has been marked as Plaintiffs' Exhibit (PX) 1468.

171. Attached hereto as Exhibit 168 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0073418 to 420 which has been marked as Plaintiffs' Exhibit (PX) 1482.

172. Attached hereto as Exhibit 169 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0981919 to 921 which has been marked as Plaintiffs' Exhibit (PX) 1471.

173. Attached hereto as Exhibit 170 is a true and correct copy of a document produced in this litigation Bates-stamped SUNROAD_0001840 to 841.

174. Attached hereto as Exhibit 171 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2880968 to 970.

175. Attached hereto as Exhibit 172 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-0793256 to 957.

176. Attached hereto as Exhibit 173 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2856997.

177. Attached hereto as Exhibit 174 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2308763 to 764.

178. Attached hereto as Exhibit 175 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2856996 to 997.

179. Attached hereto as Exhibit 176 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-1399589 to 591.

180. Attached hereto as Exhibit 177 is a true and correct copy of a document produced in this litigation Bates-stamped REYMDL00204120.

181. Attached hereto as Exhibit 178 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-3111769 to 777.

182. Attached hereto as Exhibit 179 is a true and correct copy of a document produced in this litigation Bates-stamped COX_0037531 to 551.

183. Attached hereto as Exhibit 180 is a true and correct copy of selected excerpts from the transcript of the deposition of J. David Brookshire dated May 7, 2019.

184. Attached hereto as Exhibit 181 is a true and correct copy of the Declaration of Dan McCray, dated June 13, 2017, which has been marked as Plaintiffs' Exhibit (PX) 897.

185. Attached hereto as Exhibit 182 is a true and correct copy of selected excerpts from the transcript of the deposition of Paul Whitworth (Individual) dated February 8, 2019.

186. Attached hereto as Exhibit 183 is a true and correct copy of CDK's Responses and Objections to Authenticom's First Set of Interrogatories Concerning CDK's Counterclaims dated May 7, 2018.

187. Attached hereto as Exhibit 184 is a true and correct copy of a document produced in this litigation Bates-stamped CDK-2868661 to 662 which has been marked as Plaintiffs' Exhibit (PX) 746.

188. Attached hereto as Exhibit 185 is a true and correct copy of selected excerpts from the transcript of the deposition of Michael Williams dated November 8, 2019.

189. Attached hereto as Exhibit 186 is a true and correct copy of selected excerpts from the transcript of the deposition of Seth Neilson dated January 14, 2020.

190. Attached hereto as Exhibit 187 is a true and correct copy of selected excerpts from

the transcript of the deposition of Kevin Murphy dated January 24, 2020.

191. Attached hereto as Exhibit 188 is a true and correct copy of Dealership Class Plaintiffs Amended Interrogatory Responses to CDK's Interrogatories, dated June 26, 2019.

192. Attached hereto as Exhibit 189 is a true and correct copy of a letter from Elizabeth McKenna to the Arizona Attorney General, Mark Brnovich, dated June 14, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Birmingham, Alabama, this 28th day of July, 2020.

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth

CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on July 28, 2020, I caused a true and correct copy of the foregoing **DECLARATION OF PEGGY J. WEDGWORTH** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth